

EXHIBIT 1



January 7, 2026

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Co-Lead Counsel for MDL Plaintiffs

***Co-Lead Counsel for JCCP
Plaintiffs***

Re: *In Re: Uber Rideshare Cases*, JCCP No. 5188; and *In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation*, MDL 3084

Dear Counsel:

On behalf of our clients, Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Defendants”), we are writing to provide you with a revised privilege log and replacement images corresponding with Defendants’ January 6, 2026 clawback letter, in accordance with the timeline set forth in ECF 3059, entered on May 22, 2025. The documents are identified in the chart below. As a reminder, this privilege clawback is made pursuant to the Stipulation and Amended Protective Order

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issued in the JCCP on March 6, 2025, the MDL Protective Order (ECF 176), PTO 14 (ECF 396), and in accordance with PTO 16 (ECF 866).

Beginning Bates – Ending Bates	JCCP_MDL Priv Log No.	Prod. Volume
UBER_JCCP_MDL_000908314 - UBER_JCCP_MDL_000908314	JCCP_MDL_PRIVLOG110335	JCCP_MDL017; JCCP_MDL125. JCCP_MDL315
UBER_JCCP_MDL_003679334 - UBER_JCCP_MDL_003679334	JCCP_MDL_PRIVLOG110334	JCCP_MDL135, JCCP_MDL315
UBER_JCCP_MDL_005453872 - UBER_JCCP_MDL_005453878	JCCP_MDL_PRIVLOG093175	JCCP_MDL151, JCCP_MDL315
UBER_JCCP_MDL_002340646 - UBER_JCCP_MDL_002340658	JCCP_MDL_PRIVLOG110337	JCCP_MDL064, JCCP_MDL315
UBER_JCCP_MDL_005086849 - UBER_JCCP_MDL_005086849	JCCP_MDL_PRIVLOG110336	JCCP_MDL190, JCCP_MDL315
UBER_JCCP_MDL_001197028 - UBER_JCCP_MDL_001197029	JCCP_MDL_PRIVLOG110333	JCCP_MDL033, JCCP_MDL315
UBER_JCCP_MDL_005353908 - UBER_JCCP_MDL_005354204	JCCP_MDL_PRIVLOG110338	JCCP_MDL197, JCCP_MDL315
UBER_JCCP_MDL_003610881 - UBER_JCCP_MDL_003610932	JCCP_MDL_PRIVLOG076958	JCCP_MDL132, JCCP_MDL315

Defendants did not waive their privilege claim by the inadvertent production of this privileged material, and make this privilege clawback pursuant to the Stipulation and Amended Protective Order issued in the JCCP on March 6, 2025, Federal Rule of Civil Procedure 26 (b)(5)(B), the MDL Protective Order (ECF 176), and Stipulated Pretrial Order No. 14: Federal Rule of Evidence 502 (D) and Privilege Materials (ECF 396).

In accordance with Section 11 of the JCCP Stipulation and Amended Protective Order entered on March 6, 2025, Defendants demand that JCCP Plaintiffs and their counsel take the following immediate steps as required by the Order: (1) use reasonable efforts to destroy or sequester all copies of the inadvertently produced document and associated metadata in their possession, custody, or control and notify Defendants when they have done so; and (2) take reasonable steps to retrieve and destroy or sequester the inadvertently produced privileged material and associated metadata from other persons, if any, to whom such privileged document and associated metadata has been provided, and notify Defendants when they have done so.

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Likewise, pursuant to Section 11 of MDL Protective Order (ECF 176), Federal Rule of Civil Procedure 26 (b)(5)(B), and Stipulated Pretrial Order No. 14: Federal Rule of Evidence 502 (D) and Privilege Materials (ECF 396), Defendants demand that MDL Plaintiffs and their counsel take the following immediate steps: (1) sequester, destroy, or return the inadvertently produced document and associated metadata, and all copies thereof, as well as any analyses, memoranda, or notes or portions thereof which were internally generated and contain or were based upon the privileged materials identified in this letter; (2) not use or disclose the information for any purpose except contesting the assertion of privilege; (3) take reasonable steps to retrieve the information if you disclosed it before being notified; and (4) notify Defendants when they have taken the steps.

We are re-producing the documents via secure file transfer portal. Per the agreement of the parties in the JCCP and MDL, Defendants are making a single production in both actions, with the Bates prefix of UBER_JCCP_MDL. Please be advised that documents in this production are labeled “CONFIDENTIAL” or “HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY” pursuant to the MDL Protective Order entered by the Court on December 28, 2023 and the JCCP Stipulation and Amended Protective Order entered by the Court on March 6, 2025. These materials must be handled and stored strictly in compliance with the Courts’ Orders. Any unauthorized disclosure, use, or distribution of these materials constitutes a violation of the Court’s Protective Order and we will assume that any unauthorized disclosure, use, or distribution of these materials is committed by any and all receiving parties. We will pursue the violator(s) for immediate enforcement action, including but not limited to sanctions, and other remedies available at law and in equity.

You can access the production materials at the following FTP link: <https://ftp.lhediscovery.com/> and the revised privilege log at the following link: <https://kiteworks.shb.com/#/folder/5cc6c16a-b0c1-4119-8975-2f87db62ba58>. The passwords will also be forwarded by separate email. Defendants reserve their right to seek further relief concerning this matter as provided in the relevant court orders, rules, or statutes. Defendants also reserve the right to amend, supplement, correct, or modify the information contained herein and in the associated documents, if and as we obtain additional information.

Sincerely,



Michael B. Shortnacy
Partner